Remarks

The present amendment is provided in response to the Office action dated January 30, 2006, in which claims 11–16 and 35 were rejected. In the present amendment, claim 35 has been amended; claims 36–47 have been added; and claims 1 – 34 have been cancelled without prejudice. Accordingly, claims 35 – 47 are pending in the present application, with claims 35, 42, and 47 being independent claims. Reconsideration and allowance of pending claims 35 – 47 in view of the amendments and the following remarks are respectfully requested.

Objection to Specification

In Section 8 of the Office Action, the disclosure is objected to for containing embedded hyperlinks and/or other forms of browser-executed code. Applicant does not intend for the hyperlinks cited in the disclosure to be active links, pursuant to MPEP § 608.01, Section VII. Accordingly, Applicant respectfully requests that the objection to the specification be withdrawn.

35 U.S.C. §112

Claims 11–16 and 35 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Claims 11 – 16 have been cancelled and claim 35 has been amended in a manner to address this rejection. Applicant submits that the § 112 rejection of claim 35 has been overcome by the amendment and withdrawal of the rejection is requested.

35 U.S.C. §102(e)

Claim 35 stands rejected under section 102(e) as being anticipated by U.S. Patent No. 6,574,644 ("Hsu").

Embodiments of the present invention provide for automatically generating, "in a first document, a link or links to another document or documents. The first document includes a specification for what documents the first document should link to, and how the links should be presented. When the first document is created or edited, the available documents are searched for documents that meet the specification. Links to documents that meet the specification are generated and added to the first document. Alternatively, specified information, such as the titles, from the

other documents is added to the first document instead of, or in addition to, the links." *Specification, paragraph 8*.

Accordingly, in one aspect of the present invention, a computer-implemented method for automatically adding information based on a linked document to a list document provides a list document that includes a specification identifying one or more identifying features of a linked document; searches a group of linked documents to identify one or more linked documents that match one or more identifying features of the specification; generates a link for each of the matching linked documents; and adds each generated link to the list document. *(See generally Figure 9, and Specification, pages 44–46.)*

Applicant asserts that Hsu does not teach or suggest all the limitations of amended claim 35. The Office Action states that "Hsu discloses storing a document specification for a destination document." *Office Action, page 7, lines 22–23*. The Office Action states further that "Hsu discloses identifying a document from a group containing the source document and the destination document, where the source document meets the specification of the destination document and adding the information to the destination document based on the source document." *Office Action, page 7, lines 25–28*. To support this contention, the Office Action cites Hsu as disclosing a "rule [that] uses an intermediate destination to identify the AIU file of the P&I ... diagram that contains the KKS number pattern .... Then the file name of the AIU file is extracted to form the file name of the P&I diagram." *Office Action, page 7, line29 to page 8, line 3*.

This passage from Hsu does not teach the claimed elements for which it is cited. Nowhere does the cited passage state or suggest that a group of linked documents is searched to identify one or more linked documents that match one or more of the one or more identifying features, as required by amended claim 35. Additionally, Hsu does not fairly teach or suggest the generated links in the list document are updated when the document corresponding to the link is changed or a new matching linked document is added. This is also required by amended claim 35.

In contrast, Hsu teaches a manual system that interactively works with an author to identify objects to be linked to and then automates the generation of the underlying HTML or other source code language so that the syntax and other knowledge of the underlying source code language do not have to be known by the author. *(See, column 2, lines 40 – 42)*.

More specifically, Hsu describes an automated way to replace non-linked references in a source document with links. That is, a portion of text in a source document (like "Fig 1" or "IBM" can be replaced with a link to an appropriate destination document. Hsu teaches the scanning of source documents, finding words or phrases that should be linked according to various rules or manual instructions, and then automating the insertion of the links for the identified portion of text.

Importantly, Hsu only discloses the scanning of existing documents and the finding of existing text in those documents and then wrapping a link around that text. The claimed invention, by contrast, is creating a new document and adding new links into the newly created document. Hsu provides no teaching or even suggestion that new documents are created and that new links are created within the new documents. Accordingly, Hsu does not anticipate the claimed invention.

Furthermore, one embodiment of the claimed invention is directed toward generating a new document and maintaining the content of the new document that includes a list of linked documents, e.g., an index. For example, the claimed invention can maintain a set of links to all of the files in a particular directory. As the files in the directory change, the claimed invention updates the list of linked document to reflect those changes – such that, for example, newly added documents in the directory appear in the content of the new document and automatically provide a link to the newly added document.

While Hsu might look at text like "See Fig 193" and make the "Fig 193" a live link, the claimed invention can be used to build a new page containing a list (with links) of all the documents that relate to a particular topic or all of the newest documents, etc. Importantly, and advantageously, as documents that match the list criteria are added or removed from the system, the list in the new page automatically reflects those changes. Hsu does not teach this claimed invention.

Based on the foregoing discussion, Applicant asserts claim 35 is presently allowable over Hsu. Since claims 36 – 41 depend from claim 35, these claims are therefore also allowable over Hsu. Accordingly, it is submitted that claims 35 – 41 are presently in condition for allowance in view of the amendment to claim 35 and the present remarks and withdrawal of the rejection and a notice of allowance is respectfully requested.

New Claims 42 – 47

New independent claims 42 and 47 and dependent claims 43 – 46 have been added. These claims parallel and substantially recite the subject matter of independent claim 35 and dependent claims 36 – 41. Claims 42 – 46 are claimed as system embodiments while claim 47 is claimed as a method embodiment. No new matter has been added. Accordingly, Applicant respectfully requests entry and allowance of new claims 42 – 47.

Conclusion

If the Examiner has any questions or comments regarding the above Amendments and Remarks or believes that a telephone conversation may be useful in advancing prosecution, the Examiner is invited to contact the undersigned at the number listed below.

Respectfully submitted,
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